

EXHIBIT A

From: Safavi, Nancy (CIV)

Sent: Wednesday, July 2, 2025 1:28 AM

To: Xiangnong Wang

CC: Noam Biale; Strokus, Jessica D. (CIV); Courtney Gans; Alexandra Conlon; Michael Tremonte; Alexander A Abdo; Jackson Busch; Jameel Jaffer; Ramya Krishnan; Scott Wilkens; Murphy, Lindsay M. (CIV); Busen, Jesse (CIV); Hennes, Stefanie (CIV); Kanter, Ethan (CIV); Kanellis, William G. (CIV); Santora, Victoria M (CIV); Stone, Paul (CIV); Hockenberry, Tia (CIV)

Subject: Re: [EXTERNAL] Re: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Hi, we have not been able to get a hold of anybody because phones are down. It seems more likely than not that the deposition in Boston will not go forward tomorrow because of the weather and all the cancellations and outages.

Sent from my iPhone

On Jul 1, 2025, at 11:02 PM, Xiangnong Wang <george.wang@knightcolumbia.org> wrote:

Hi all,

Please confirm by 11:30 tonight if this deposition is proceeding tomorrow, or we will assume that it is not happening.

Thanks,
George

On Jul 1, 2025, at 9:49 PM, Noam Biale <NBiale@shertremonte.com> wrote:

This Message Is From an External Sender
This message came from outside your organization.

Hi All,

Can you please let me know if we can move forward tomorrow or if I can cancel my flight?

Noam

<Image.jpeg>

Noam Biale
90 Broad Street, 23rd Floor | New York, NY 10004
tel: 212.300.2445 | fax: 212.202.4156
nbiale@shertremonte.com
www.shertremonte.com

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From: Noam Biale <NBiale@shertremonte.com>

Sent: Tuesday, July 1, 2025 8:45:34 PM

To: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Courtney Gans <CGans@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>; Michael Tremonte <MTremonte@shertremonte.com>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>

Cc: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Safavi, Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Hockenberry, Tia (CIV) <Tia.Hockenberry@usdoj.gov>

Subject: Re: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Please let me know if you can depose our witness later tomorrow.

<Image.jpeg>

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From: Noam Biale <NBiale@shertremonte.com>

Sent: Tuesday, July 1, 2025 7:46:06 PM

To: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Courtney Gans <CGans@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>; Michael Tremonte <MTremonte@shertremonte.com>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>

Cc: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Busen, Jesse (CIV)

<Jesse.Busen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>;
Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Kanellis, William G. (CIV)
<William.G.Kanellis@usdoj.gov>; Santora, Victoria M (CIV)
<Victoria.M.Santora@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Safavi,
Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Hockenberry, Tia (CIV)
<Tia.Hockenberry@usdoj.gov>
Subject: Re: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Unfortunately, our witness is not available either of those days.

<Image.jpeg>

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From: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>
Sent: Tuesday, July 1, 2025 7:34:11 PM
To: Noam Biale <NBiale@shertremonte.com>; Courtney Gans
<CGans@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>;
Michael Tremonte <MTremonte@shertremonte.com>; Alexander A Abdo
<alex.abdo@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>;
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<William.G.Kanellis@usdoj.gov>; Santora, Victoria M (CIV)
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Nancy (CIV) <Nancy.Safavi@usdoj.gov>; Hockenberry, Tia (CIV)
<Tia.Hockenberry@usdoj.gov>
Subject: RE: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Hi, Noam.

We can depose her on July 4 or July 5. Which works best for Ms. Al-Ali?

Best,
Jessica

Jessica D. Strokus
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation, Appellate Section
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20044

202-616-8779

<image001.png>

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From: Noam Biale <NBiale@shertremonte.com>

Sent: Tuesday, July 01, 2025 6:22 PM

To: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Courtney Gans <CGans@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>; Michael Tremonte <MTremonte@shertremonte.com>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>

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Subject: [EXTERNAL] Re: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Hi Jessica,

Unfortunately, the 3rd does not work for us or for Prof. Al-Ali. We could start later in the day tomorrow or would be open to you taking the deposition remotely. Let us know if either of those options work for you.

Noam

<image002.jpg>

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From: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>

Sent: Tuesday, July 1, 2025 6:16:52 PM

To: Courtney Gans <CGans@shertremonte.com>; Noam Biale <NBiale@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>; Michael Tremonte <MTremonte@shertremonte.com>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Jameel Jaffer <jameel.jaffer@knightcolumbia.org>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>
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Subject: AAUP: Rescheduling Al-Ali Deposition due to Weather & Flight Cancellations

Good evening,

Our team has been significantly impacted by the weather cancellations and delays impacting the east coast this afternoon and evening and no one from our team will be in Boston tomorrow morning to take the deposition of Ms. Al-Ali. We are working to rebook our travel with the limited options available, but are not guaranteed to arrive in time to begin the deposition tomorrow as we had initially hoped. Would Plaintiffs be amenable to postponing Ms. Al-Ali's deposition to Thursday, July 3?

Thank you,
Jessica

Jessica D. Strokus

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